

### **REMARKS**

Applicant's representative telephoned the Examiner on July 26, 2007, to try and schedule a personal interview to discuss the outstanding issues in this application. However, the Examiner stated that her supervisor generally does not permit personal interviews in applications that are after final.

As Applicant believes that a personal interview would be very helpful in understanding the Patent Office's position on the outstanding rejections, Applicant formally requests a personal interview with the Examiner and her supervisor during which any outstanding issues can be discussed.

In any case, claims 1-20 are pending in the present application.

The Office Action rejects claims 1-8, 11-15, and 17-20 under 35 U.S.C. 102(b) as being anticipated by Geerlings (U.S. Patent No. 5,956,693). The Office Action also rejects claims 9-10 under 35 U.S.C. 103(a) as being obvious over Geerlings. The Office Action also rejects claim 16 under 35 U.S.C. 103(a) as being obvious over Geerlings in view of Kramer et al. (U.S. Patent No. 6,327,574). These rejections are traversed for at least the reasons that follow.

It is respectfully noted that the present claims all require, *inter alia*, "statistically analyzing a collection of data representing historical interactions with a plurality of previous customers **including at least one non-purchaser**"

(excerpt of claim 1, bold added).

Geerlings discloses shopping activity or history that “includes (1) actions invoked by the customer, such as complaints, purchases or other transactions, (2) actions invoked by the merchant...”

However, Geerlings does not appear to teach or suggest that the complainers are not purchasers, as would be required to meet the limitations of the present claims. In fact, Applicant respectfully submits that one of skill in the art would have expected that Geerlings' complainers are unhappy in some way with their purchase.

Kramer et al. is directed to hierarchical models of consumer attributes for targeting content in a privacy-preserving manner. Applicant respectfully submits that Kramer et al. fails to teach or suggest statistically analyzing a collection of data representing historical interactions with a plurality of previous customers **including at least one non-purchaser**” and thus fails to make up for the deficiencies in Geerlings.

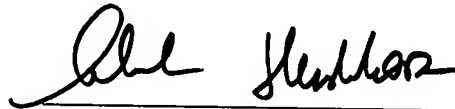
Thus, Applicant respectfully submits that the present claims are not anticipated nor obvious over Geerlings alone, or in combination with Kramer et al.

Should the Patent Office have any questions or comments regarding this matter, the undersigned may be contacted at the below-listed telephone number.

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Reply to Office Action of February 8, 2007  
P68364.A04

The Patent and Trademark Office is hereby authorized to charge any fees necessary to preserve the pendency of this application, or credit any overpayment to deposit account No. 50-2929, referencing Docket No. P68364.

Respectfully submitted,  
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